

JOEL K. BELWAY [60556]
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Attorney for Defendant
 and Counterclaimant
 STEPHANIE DODSON

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

In re:) Case No. 05-32929
)
ALEXANDER N. POPOV,) Chapter 7
)
Debtor.)
)
) A.P. No. C-08-225-SC
YUGEN KAISAH, Y.K.F.)
) DECLARATION OF JOEL K. BELWAY RE
) MOTION FOR (1) ABSENTION, OR,
) ALTERNATIVELY, (2) FOR A STAY,
) AND (3) SECURITY FOR COSTS
STEPHANIE DODSON,)
)
Defendant.)
) Date: April 25, 2008
) Time: 10:00 a.m.
STEPHANIE DODSON,) Court: Judge Conti
Counterclaimant,)
vs.)
)
YUGEN KAISAH, Y.K.F.)
)
Claimant.)
)

I, Joel K. Belway, declare and state as follows:

1 1. I have personal knowledge of the facts set forth in this
2 Declaration and if required I could and would testify competently
3 thereto. I am the attorney of record for defendant and counter-
4 claimant, Stephanie Dodson ("Defendant"), and make this
5 Declaration in support of her motion for security for costs.
6

7 2. I estimate that with expert witnesses, and if depositions
8 must be taken in this proceeding in Japan and North Carolina, the
9 costs herein, including court reporter's fees and travel
10 expenses, could be in the range of \$25,000.

11 I declare under penalty of perjury under the laws of the
12 State of California that the foregoing is true and correct.
13 Executed at San Francisco, California on April 11, 2008.
14

15 /s/ Joel K. Belway
16 JOEL K. BELWAY
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DECLARATION OF SERVICE

I am over the age of eighteen years and not a party to the within action. On April 11, 2008, I served the attached **Declaration of Joel K. Belway re Motion for (1) Abstention, or, Alternatively, (2) for a Stay, and (3) Security for Costs** on the interested parties in this action by placing true copies thereof in sealed envelopes and transmitting said envelopes to the following addresses by the means indicated:

Via First-Class U.S. Mail

James S. Monroe, Esq.
Gregory E. Schopf, Esq.
NIXON PEABODY LLP
One Embarcadero Center, Suite 1800
San Francisco, CA 94111-3996

Mark D. Byrne, Esq.
Triano & Byrne
25 Jessie Street
16th Floor
San Francisco, CA 94105-2749

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 11, 2008, at San Francisco, California.

\s\ Joel K. Belway